

HON. JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

VALVE CORPORATION,

Plaintiff,

v.

LEIGH ROTHSCHILD, ROTHSCHILD  
BROADCAST DISTRIBUTION SYSTEMS,  
LLC, DISPLAY TECHNOLOGIES, LLC,  
PATENT ASSET MANAGEMENT, LLC,  
MEYLER LEGAL, PLLC, AND SAMUEL  
MEYLER,

Defendants.

Case No. 2:23-cv-1016-JNW

**JOINT CLAIM CONSTRUCTION AND  
PREHEARING STATEMENT**

Complaint Filed: 07/07/2023

Pursuant to the Court’s Local Patent Rule 132, Plaintiff Valve Corporation (“Plaintiff” or “Valve”) and Defendants Leigh Rothschild; Rothschild Broadcast Distribution Systems, LLC; Display Technologies, LLC; Patent Asset Management, LLC; Meyler Legal, PLLC; and Samuel Meyler (collectively, “Defendants”) (Plaintiff and Defendants collectively referred to as “the Parties”) submit this Joint Claim Construction and Prehearing Statement.

**A. The construction of those claim terms, phrases, or clauses on which the parties agree.**

Claim Language (Agreed Terms in <b>Bold</b> )	Parties’ Agreed Construction
’221 Patent	
<p>Claim 7:</p> <p>A method for storing media content and delivering requested media content to a consumer device, the method comprising:</p> <p>receiving a request message including media data indicating requested media content and a consumer device identifier corresponding to the consumer device;</p> <p>determining whether the consumer device identifier corresponds to a registered consumer device; and</p> <p>if it is determined that the consumer device identifier corresponds to the registered consumer device, then:</p> <p>determining, whether the request message is one of a storage request message and a content request message; and</p> <p>if the request message is the storage request message, then determining whether the requested media content is available for storage; and</p> <p>if the request message is the content request message, then initiating delivery of the requested media content to the consumer device;</p> <p>wherein the <b>media data includes time data that indicates a length of time to store the requested media content</b>; and</p> <p>the first processor is further configured to determine whether the requested media content exists; and</p> <p>if the processor determines that the requested media content exists, the processor is further configured to determine whether the requested media content is available and whether there are restrictions associated with the requested media content that prevent the requested media content from being delivered to the consumer device.</p>	<p><b><u>Term</u></b></p> <p>media data includes time data that indicates a length of time to store the requested media content;</p> <p><b><u>Agreed Construction</u></b></p> <p>“media data includes time data that indicates a length of time to store the requested media content” does not include storage policies, document retention policies, emails or any data stored in a database. For clarity, “time data that indicates a length of time to store the requested media content” is not excluded from the scope of the claim if such time data is included in the request message and subsequently stored in a database.</p>

**B. Each party’s proposed construction of each disputed claim term, phrase, or clause.**

The Parties do not dispute the construction of any term, phrase or clause in the asserted ’221 Patent.

**C. The ten most important disputed claim terms.**

Not applicable. The Parties do not have any claim construction disputes.

**D. The anticipated length of time necessary for the Claim Construction Hearing.**

Not applicable. The Parties do not have any claim construction disputes.

**E. The proposed order of presentation at the Claim Construction Hearing.**

Not applicable. The Parties do not have any claim construction disputes.

**F. The parties' position on whether, why, and the extent to which the Court should consider live testimony at the Claim Construction Hearing.**

Not applicable. The Parties do not have any claim construction disputes.

**G. The parties' position as to whether there should be a tutorial on the subject matter of the patent(s) at issue and, if so, the timing of such a tutorial.**

Not applicable. The Parties do not have any claim construction disputes.

**H. Whether a pre-hearing conference, prior to the Claim Construction Hearing, is necessary and, if so, the proposed subjects to be addressed and proposed dates for such conference.**

Not applicable. The Parties do not have any claim construction disputes.

**I. Whether the parties believe the Court should appoint an independent expert.**

Not applicable. The Parties do not have any claim construction disputes.

1 DATED: March 11, 2025

Respectfully submitted,

2 By: /s/ Dario A. Machleidt

KILPATRICK TOWNSEND & STOCKTON LLP

3 Dario A. Machleidt (State Bar No. 41860)

Kathleen R. Geyer (State Bar No. 55493)

4 Christopher P. Damitio (State Bar No. 58633)

1420 Fifth Avenue, Suite 3700

5 Seattle, WA 98101

Telephone: (206) 467-9600

6 dmachleidt@kilpatricktownsend.com

7 kgeyer@kilpatricktownsend.com

cdamitio@kilpatricktownsend.com

8 Attorneys for Plaintiff

VALVE CORPORATION

9 DATED: March 11, 2025

Respectfully submitted,

10 By: /s/ Eric R. Chad

11 Matthew J. Cunanan (State Bar No. 42530)

12 DC LAW GROUP

12055 15th Ave NE, Suite B

13 Seattle, WA 98125

Telephone: (206) 494-0400

14 E-mail: matthew@dclglawyers.com

15 Donald R. McPhail (*phv*)

Merchant & Gould

1900 Duke Street, Suite 600

16 Alexandria, Virginia 22314

Telephone: (703) 412-1432

17 E-mail: dmcphail@merchantgould.com

18 Eric R. Chad (*phv*)

Merchant & Gould

150 South Fifth Street, Suite 2200

19 Minneapolis, Minnesota 55402

20 Telephone: (612) 336-4742

21 E-mail: echad@merchantgould.com

22 Attorneys for Defendants

LEIGH ROTHSCHILD, ROTHSCHILD

23 BROADCAST DISTRIBUTION SYSTEMS, LLC,

DISPLAY TECHNOLOGIES, LLC, PATENT ASSET

24 MANAGEMENT, LLC, MEYLER LEGAL, PLLC,

AND SAMUEL MEYLER